

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JACKSONVILLE POLICE AND FIRE  
PENSION FUND, on behalf of itself and  
all others similarly situated,

Plaintiff,

v.

AMERICAN INTERNATIONAL  
GROUP, INC., MARTIN SULLIVAN,  
STEVEN BENSINGER, JOSEPH  
CASSANO, and ROBERT LEWIS,

Defendants.

JAMES CONNOLLY, Individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

AMERICAN INTERNATIONAL  
GROUP, INC., MARTIN J. SULLIVAN,  
STEVEN J. BENSINGER, JOSEPH J.  
CASSANO, ROBERT E. LEWIS, and  
DAVID L. HERZOG,

Defendants.

CIV. NO. 08-CV-4772

Hon. Richard J. Sullivan

**AFFIDAVIT OF LISA M. POLLARD  
IN SUPPORT OF THE CITY OF  
SAGINAW POLICE AND FIRE  
PENSION BOARD'S MOTION FOR  
CONSOLIDATION OF ALL  
RELATED ACTIONS,  
APPOINTMENT AS LEAD  
PLAINTIFF AND APPROVAL OF ITS  
SELECTION OF LEAD COUNSEL**

CIV. NO. 08-CV-5072

Hon. Richard J. Sullivan

MAINE PUBLIC EMPLOYEES  
RETIREMENT SYSTEM, on behalf of  
itself and all others similarly situated,

Plaintiff,

v.

AMERICAN INTERNATIONAL  
GROUP, INC., MARTIN SULLIVAN,  
STEVEN BENSINGER, JOSEPH  
CASSANO, and ROBERT LEWIS,

Defendants.

ONTARIO TEACHERS' PENSION PLAN  
BOARD, on behalf of itself and all others  
similarly situated,

Plaintiff,

v.

AMERICAN INTERNATIONAL  
GROUP, INC., MARTIN SULLIVAN,  
STEVEN BENSINGER, JOSEPH  
CASSANO, and ROBERT LEWIS,

Defendants.

CIV. NO. 08-CV-5464

Hon. Richard J. Sullivan

CIV. NO. 08-CV-5560

Hon. Richard J. Sullivan

**AFFIDAVIT OF LISA M. POLLARD IN SUPPORT OF THE CITY  
OF SAGINAW POLICE AND FIRE PENSION BOARD'S MOTION  
FOR CONSOLIDATION OF ALL RELATED ACTIONS,  
APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF ITS  
SELECTION OF LEAD COUNSEL**

STATE OF NEW YORK )  
                        )  
COUNTY OF NEW YORK )

I, Lisa M. Pollard, being duly sworn, declare and state as follows:

1. I am an associate with the law firm of Lockridge Grindal Nauen P.L.L.P., counsel for the City of Saginaw Police and Fire Pension Board (“SPFPB”). I submit this declaration, together with the exhibits annexed hereto, in support of SPFPB’s motion to consolidate all related cases, to be appointed as Lead Plaintiff and for approval of its selection of Lockridge Grindal Nauen P.L.L.P. and Mager & Goldstein LLP as Lead Counsel.

2. Annexed hereto as Exhibit A is a true and correct copy of SPFPB’s certification setting forth its transactions in American International Group, Inc. common stock.

3. Annexed hereto as Exhibit B is a true and correct copy of a press release published on May 22, 2008 over the *Marketwire* regarding the pendency of this action.

4. Annexed hereto as Exhibit C is the firm biography of Lockridge Grindal Nauen P.L.L.P.

5. Annexed hereto as Exhibit D is the firm biography of Mager & Goldstein LLP.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

/s/ Lisa M. Pollard  
Lisa M. Pollard

Subscribed and sworn to before me  
this 21st day of July, 2008.

/s/ Christian Siebott  
Notary Public, State of New York  
My Commission Expires 10/21/10

## **EXHIBIT A**

**PLAINTIFF CERTIFICATION**

We, Robert Ruth and Gregory Simmons, hereby state:

1. We, on behalf of the City of Saginaw Police and Fire Pension Board ("Saginaw"), have reviewed a Complaint against American International Group, Inc., and certain of its officers and directors, and authorized the filing of the same or a similar complaint on Saginaw's behalf.

2. Saginaw did not purchase any American International Group, Inc. securities at the direction of counsel or in order to participate in this private action.

3. Saginaw is willing to serve as a representative party on behalf of a class, including providing testimony at deposition and trial, if necessary.

4. The following includes all of Saginaw's transactions in American International Group, Inc. securities during the Class Period as defined in the Complaint:

| <b><u>TRANSACTION</u></b> | <b><u>TRADE DATE</u></b> | <b><u>PRICE</u></b> | <b><u>QUANTITY</u></b> |
|---------------------------|--------------------------|---------------------|------------------------|
|---------------------------|--------------------------|---------------------|------------------------|

See Attached

5. Saginaw has filed the following civil actions as a representative party on behalf of a class under the federal securities laws during the last three years. N/A

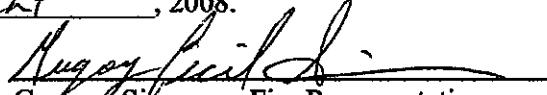
6. Saginaw will not accept any payment for serving as a representative party on behalf of a class except to receive my pro rata share of any recovery, or as ordered or approved by the Court, including the award to a representative party of reasonable costs and expenses including lost wages relating to the representation of the class.

We declare under penalty of perjury that the foregoing is true and correct.

Executed this 16 day of JULY, 2008.

  
\_\_\_\_\_  
Robert Ruth, Police Representative  
City of Saginaw Police and Fire Pension Board

Executed this 16 day of JULY, 2008.

  
\_\_\_\_\_  
Gregory Simmons, Fire Representative  
City of Saginaw Police and Fire Pension Board

**ATTACHMENT A**

| <b><u>TRANSACTION</u></b> | <b><u>TRADE DATE</u></b> | <b><u>PRICE</u></b> | <b><u>QUANTITY</u></b> |
|---------------------------|--------------------------|---------------------|------------------------|
| Purchase                  | 06/25/07                 | 72.2400             | 480                    |
| Purchase                  | 07/16/07                 | 68.2723             | 1,550                  |
| Purchase                  | 07/18/07                 | 69.7163             | 6,200                  |
| Sale                      | 11/15/07                 | 55.6275             | 2,590                  |
| Sale                      | 02/14/08                 | 45.0214             | 3,200                  |
| Sale                      | 03/20/08                 | 39.3165             | 2,700                  |
| Sale                      | 03/20/08                 | 39.6073             | 2,100                  |
| Sale                      | 04/15/08                 | 45.8305             | 3,700                  |
| Sale                      | 04/22/08                 | 46.1615             | 3,170                  |

## **EXHIBIT B**

May 22, 2008 12:43 ET

## Bernstein Litowitz Berger & Grossmann LLP Announces Filing of Class Action Suit Against AIG and Certain of Its Senior Officers and Directors

NEW YORK, NY--(Marketwire - May 22, 2008) - Bernstein Litowitz Berger & Grossmann LLP ("BLB&G") today announced that it filed a class action lawsuit in the United States District Court for the Southern District of New York on behalf of its client Jacksonville Police and Fire Pension Fund ("Jacksonville Police & Fire") and purchasers of the securities of American International Group, Inc. ("AIG" or the "Company") (NYSE: AIG) during the period from May 11, 2007 through May 9, 2008 (the "Class Period"). The case is captioned Jacksonville Police and Fire Pension Fund v. American International Group, Inc., et al., Case No., 08-CV-4772.

The Complaint alleges that during the Class Period, AIG and the individual defendants, Chief Executive Officer Martin J. Sullivan, Executive Vice President and Chief Financial Officer Steven J. Bensinger, Senior Vice President and Chief Risk Officer Robert Lewis and Joseph Cassano, the former head of AIG subsidiary American International Group Financial Products ("AIGFP"), violated the federal securities laws by issuing false and misleading press releases, financial statements, filings with the SEC and statements during investor conference calls. The Complaint alleges that, throughout the Class Period, Defendants repeatedly reassured investors that AIG had successfully insulated itself from the recent turmoil in the housing and credit markets due to its superior risk management. In particular, defendants touted the security of AIGFP's "super senior" credit default swap ("CDS") portfolio, making numerous statements that this portfolio was secure and that AIG's method for accounting for the valuations of this portfolio accurately reflected its value.

Investors began to learn the truth regarding AIG's financial condition and the Company's exposure to the mortgage market when, on February 11, 2008, the Company disclosed that its outside auditor had determined that there was "material weakness in its internal control" over the financial reporting and oversight relating specifically to its accounting for the CDS portfolio, and that the Company was revising the loss valuations it previously reported. Under the new valuations, losses on the CDS portfolio more than quadrupled -- from the \$1.4 billion reported on the CDS portfolio just weeks before to over \$4.5 billion. Two weeks later, on February 28, 2008, AIG disclosed that the market valuations on the CDS portfolio would increase to \$11.5 billion and revealed for the first time that the Company had notional exposure of \$6.5 billion in liquidity puts written on collateralized debt obligations ("CDOs") linked to the sub-prime mortgage market. Finally, on May 8, 2008, the Company disclosed that market valuation losses on the CDS portfolio for the quarter climbed an additional \$9.1 billion, for a cumulative loss of \$20.6 billion, and that the Company was expecting actual losses on the portfolio to be about \$2.4 billion. As a result of these disclosures, the price of AIG stock plunged from a Class Period high of \$75.24 per share on June 5, 2008, to \$38.37 per share on May 12, 2008, wiping out tens of billions of dollars in shareholder value and causing damage to the class.

The Complaint alleges that the Defendants violated Section 10(b) of the Securities Exchange Act of 1934 (the "Exchange Act") and Rule 10b-5 promulgated thereunder and that Defendants Sullivan and Bensinger violated Section 20(a) of the Exchange Act.

If you wish to serve as lead plaintiff, you must move the Court no later than 60 days from May 22, 2008. Accordingly, the deadline for filing a motion for appointment as lead plaintiff is July 21, 2008. If you wish to discuss this action or have any questions concerning this notice or your rights or interests, please contact Plaintiff's counsel, Gerald H. Silk or Salvatore J. Graziano of BLB&G at 212-554-1400, or via e-mail at [jerry@blbglaw.com](mailto:jerry@blbglaw.com) or [sgraziano@blbglaw.com](mailto:sgraziano@blbglaw.com), respectively. You can view a copy of the Complaint as filed online at <http://www.blbglaw.com>. Any member of the class may move the Court to serve as lead plaintiff through counsel of their choice, or may choose to do nothing and remain a member of the proposed class.

Plaintiff Jacksonville Police & Fire is represented by BLB&G, a firm of 50 attorneys with offices in New York, California, Louisiana and New Jersey, which has extensive expertise in prosecuting investor class actions involving financial fraud. Since its founding in 1983, BLB&G has built an international reputation for excellence and integrity. Specializing in securities fraud, corporate governance, shareholders' rights, employment discrimination and civil rights litigation, among other practice areas, BLB&G prosecutes class and private actions on behalf of institutional and individual clients worldwide. Unique among its peers, BLB&G has obtained six of the ten largest and most significant securities recoveries in history, recovering nearly \$20 billion on behalf of defrauded investors.

The AIG action has been investigated and is being prosecuted by BLB&G's subprime litigation group, which is also representing investors in class and derivative subprime related actions against Washington Mutual, Inc., American Home Mortgage Investment Corp., New Century Financial Corporation, Countrywide Financial Corporation and State Street, among others. More information about Bernstein Litowitz Berger & Grossmann LLP can be found online at [www.blbglaw.com](http://www.blbglaw.com).

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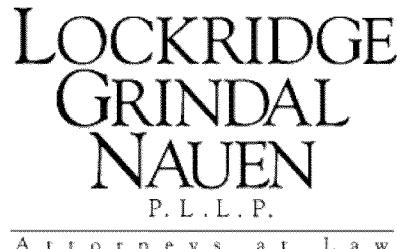
CONTACT:

Bernstein Litowitz Berger & Grossmann LLP, New York, N.Y.

Gerald H. Silk  
212-554-1400

Salvatore J. Graziano  
212-554-1400

## **EXHIBIT C**



Founded in 1978, Lockridge Grindal Nauen P.L.L.P. has extensive experience in antitrust, securities, environmental, employment, health care, commercial, intellectual property and telecommunications law.

Our clients include pension funds, unions, agri-businesses, business enterprises, banks, local governments, trade and industry associations, real estate developers, telecommunications providers, health care professionals, casualty insurers, publishers and authors, and a major computer manufacturer and retailer.

Lockridge Grindal Nauen attorneys are assisted by more than 20 paralegals and government relations specialists, and an extensive support staff. The firm has offices in Minneapolis, Minnesota and Washington, D.C.

### **Richard A. Lockridge**

Richard A. Lockridge is a partner in Lockridge Grindal Nauen P.L.L.P. He is a graduate of the University of Iowa Law School (J.D., with high distinction, 1974) where he served as Managing Editor of the Iowa Law Review. Thereafter, from 1974 to 1976, he served as a law clerk to the Honorable Myron H. Bright of the United States Court of Appeals for the Eighth Circuit. From 1976 to 1978 he handled civil litigation as a Minnesota Special Assistant Attorney General.

During almost thirty years of practice, Mr. Lockridge has been continuously active in class action and other complex litigation, including the following cases in which he has been lead or co-lead counsel:

- In re Select Comfort Corporation Securities Litigation, Master File No. 99-884 (D. Minn.);
- In re Baycol Products Litigation, MDL No. 1431 (D. Minn.);
- In Re Microcrystalline Cellulose Antitrust Litigation, MDL 1402 (E.D. Pa.);
- In re Monosodium Glutamate Antitrust Litigation, MDL No. 1328 (D. Minn.);
- In Re Lutheran Brotherhood Variable Insurance Products Co. Sales Practices Litigation, MDL No. 1309 (D. Minn.);
- Gary Meyers v. The Guardian Life Insurance Company of America, Inc. Litigation, Civil No. 2:97CV35-D-B (N.D. Miss.);
- Alan B. Spitz and Linda Spitz, and Ann Novacheck v. Connecticut General Life Insurance Company, MDL No. 1136 (C.D. Cal.);
- In re Summit Medical Systems, Inc. Securities Litigation, Master File No. 97-558 (D. Minn.);
- In re Digi International Inc. Securities Litigation, Master File No. 97-5 (D. Minn.);
- In re Catfish Antitrust Litigation, MDL No. 928 (N.D. Miss.);
- Benacquisto, et al. v. American Express Financial Corp. et al., Master File No. 00-1980 (D. Minn.), Civil Action No. 96-18477 (Hennepin County District Court Minn.) (insurance class action);
- Gary G. Smith, et al. v. Little Caesar Enterprises, Inc., et al. (Little Caesar Franchise Litigation), Civil No. 93 CV 74041 DT (E.D. Mich.);
- In re Piper Funds, Inc. Institutional Government Income Portfolio Litigation, Master File No. 3-94-587 (D. Minn.);
- In re Residential Doors Antitrust Litigation, MDL No. 1039 (E.D. Pa.);
- In re Carpet Antitrust Litigation, MDL No. 1075 (N.D. GA);
- In re LaserMaster Technologies, Inc. Securities Litigation, Master File No. 4-95-631 (D. Minn.);
- Richard J. Rodney, Jr., et al. v. KPMG Peat Marwick, 4-95-CIV-800 (D. Minn.);
- In re Citi-Equity Group, Inc. Securities Litigation, Master File No. 3-94-1024 (D. Minn.);
- Lockwood Motors, Inc., et al. v. General Motors Corporation, Master File No. 3-94-1141 (D. Minn.);
- David L. Antonson, et al. v. Leon H. Robertson, et al. (American Carriers Securities Litigation) Civ. No. 88-2567 (D. Kan.);
- In re Steel Drums Antitrust Litigation, MDL No. 887 (S.D. Ohio);

- In re New Steel Pails Antitrust Litigation, Master File No. C-1-91-213 (S.D. Ohio);
- In re Unisys Savings Plan Litigation, Master File No. 91-3067 (E.D. Pa.); and
- George Guenther, et al. v. Cooper Life Sciences, et al. (Cooper Life Sciences Securities Litigation), C 89-1823 MHP (N.D. Cal.).

Mr. Lockridge also is or has been involved in the following litigation:

- In re Air Cargo Shipping Services Antitrust Litigation, 1:06-md-1775-CBA-VVP (E.D.N.Y.);
- Funeral Consumers Alliance, Inc., et al. v. Service Corporation International, et al., No. H-05-3394 (S.D. Tex.);
- In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation, MDL 1720 (E.D.N.Y.);
- In re Worldcom, Inc. Securities Litigation No. 02-CV-3288 (S.D.N.Y.);
- In re Credit Suisse – AOL Securities Litigation, Case No. 1:02-CV-12146-NG (D. Mass.);
- Haritos, et al. v. American Express Financial Advisors, Inc., 02-2255-PHX-PGR (D. Ariz.);
- In re King Pharmaceuticals, Inc. Securities Litigation, No. 2:03-CV-77 (E.D. Tenn.);
- In re Delphi Corporation Securities, ERISA, and Shareholder Derivative Litigation, Master Case No. 05-md-1725 (E.D. Mich.);
- In re Merck & Co., Inc., Securities, Derivative & ERISA Litigation, 3:050cv-1151 (D.N.J.);
- In re AOL Time Warner Securities Litigation, MDL No. 1500 (S.D.N.Y.);
- In re Vioxx Product Liability Litigation, MDL No. 1657 (E.D.La.);
- In re Scientific-Atlanta, Inc. Securities Litigation, No. 1:01-CV-1950 (N.D. Ga.);
- In re OM Group, Inc. Securities Litigation, No. 1:02 CV 2163 (N.D. Ohio);
- Ohio Public Employees Retirement System, et al. v. Freddie Mac, et al., MDL No. 1584 (S.D.N.Y.) (Federal Home Loan Mortgage Corporation Securities Litigation);
- In re Federal National Mortgage Association Securities, Derivative and ERISA Litigation, MDL No. 1668 (D. D.C.);
- Rodney v. OCA, Inc., et al., No. 05-2219 (E.D. La.);
- In re Telxon Securities Litigation, No. 5:98-CV-2876 (N.D. Ohio);

- In re Retek, Inc. Securities Litigation, Master File No. 02-4209 (D. Minn.);
- Aviva Partners, LLC, v. Navarre Corp., et al., Master File No. 05-1151 (D. Minn.);
- In re Chronimed Inc., Securities Litigation, Master File No. 01-1092 (D. Minn.);
- Glen Lewy 1990 Trust v. Investment Advisers, Inc., et al., No. CT-00-17047 (Henn. Cty. Dist. Ct.);
- Fink v. Rainforest Café, No. MC 00-451 (Henn. Cty. Dist. Ct.);
- Crosby v. Aid Association for Lutherans, Master File No. 00-CV-2112 (D. Minn.);
- In re Rezulin Litigation, MDL 1348 (S.D. N.Y.);
- In re Serzone Productions Liability Litigation, MDL No. 1477 (S.D.W.V.);
- In re Tamoxifen Citrate Antitrust Litigation, MDL No. 1408 (E.D. N.Y.);
- In re Western Union Money Transfer Litigation, Master File No. CV 01 0335 (E.D.N.Y.);
- In re Meridia Products Liability Litigation, MDL No. 1481 (N. D. Ohio);
- In Re Propulsid Products Liability Litigation, MDL No. 1355 (E.D. LA);
- In re Methionine Antitrust Litigation, MDL No. 1311 (N.D. Cal.);
- In re Flat Glass Antitrust Litigation, MDL No. 1200 (W.D. PA);
- Chemical Distribution, Inc., et al. v. Akzo Nobel Chemicals, et al., MDL No. 1226 (N.D. Cal.);
- Durocher v. American Family Life Insurance Co., Case No. 97-CV-292 (Marinette Co. Dist.);
- Marksman Partners, L.P., et al. v. Chantal Pharmaceutical Corporation, et al., Master File No. CV-96-0872-WJR (C.D. Cal.);
- In re Connecticut General Life Insurance Co. Premium Litigation, MDL No. 1336 (C.D. Cal.);
- In re Lease Oil Antitrust Litigation, MDL No. 1166 (S.D. Tex.);
- In re Tricord Systems, Inc. Securities Litigation, Master File No. 3-94-746(D. Minn.);
- In re Riscorp, Inc. Securities Litigation, Master File No. CV-96-2374-CIV-T-23A (M.D. Fla.);
- In re Nasdaq Market-Maker Antitrust Litigation, MDL No. 1023 (S.D.N.Y.);

- John S. Lawrence v. Philip Morris Companies, Inc., et al. (Philip Morris Securities Litigation), Civ. No. 94-1494 (E.D.N.Y.);
- Leetate Smith, et al. v. Merrill Lynch & Co., et al. (Orange County Bond Litigation), No. SACV-94-1063-LHM(EEx) (C.D. Cal.);
- Nelsen v. Craig-Hallum (Craig-Hallum Securities Litigation), Master File No. 4-86-135 (D. Minn.);
- Johnson v. Kives (K-Tel Securities Litigation), Master File No. 4-85-1216 (D. Minn.);
- In re Endotronics Securities Litigation, Master File No. 4-87-130 (D. Minn.);
- In re Wirebound Box Antitrust Litigation, MDL No. 793 (D. Minn.);
- American Telephone and Telegraph Antitrust Litigation, Civil Action No. 81-2623 (D.D.C.);
- In re Domestic Air Transportation Antitrust Litigation, MDL No. 861 (N.D. Ga.);
- In re Painewebber Securities Litigation, 86 Civ. 6776 (S.D.N.Y.);
- In re ICN/Viratek Securities Litigation, 87 Civ. 4296 (S.D.N.Y.);
- In re Bioplasty Securities Litigation, Master File No. 4-91-689 (D. Minn.);
- Low Density Polyethylene Resin Antitrust Litigation, No. 82 Civ. 1093 (S.D.N.Y.);
- Dixie Brewing Company, Inc. v. John Barth, Inc. (In re Hops Antitrust Litigation), Civ. No. 8404434 (E.D. Pa.);
- Steven S. Mitchell v. Thousand Trails, Inc. (Thousand Trails Security Litigation), Civ. No. C86-146 (W.D. Wash.); and
- Spencer v. Comserv Corporation (Comserv Securities Litigation), Master File No. 4-84-794 (D. Minn.).
- In re Medtronic, Inc. Implantable Defibrillator Products Liability Litigation, MDL No. 05-1726 (JMR/AJB)
- In re Guidant Corp. Implantable Defibrillators Products Liability Litigation, MDL No. 05-1708 (DWF/AJB)
- In re Tyco International, Ltd., ERISA Civil File No. 02-cv-1357 (D. NH)

Mr. Lockridge acted as co-lead defense counsel for the target defendant in Mid-State Oil v. Simonson Oil (price fixing) Civil No. A3-79-18 (D.N.D.); plaintiff's counsel in Superlines Co.

v. E.W. Wylie Corp., 1981-2 Trade Cases (CCH) (D. Minn. 1981); and one of the defense counsel in Ray Adduono v. World Hockey Association, Master File No. 3-82-586 (D. Minn.).

Mr. Lockridge spent one year in Houston, Texas working on the trial of the Corrugated Container Antitrust Litigation, MDL No. 310 (S.D. Tex), a case which resulted in one of the largest verdicts (in excess of \$1 billion) ever awarded by a jury in antitrust litigation. He was also part of the plaintiffs' trial team for In re High Pressure Laminates Antitrust Litigation, MDL No. 1368 (S.D.N.Y.), which was recently tried in the Southern District of New York, a case in which settlements totaled over \$40 million.

Mr. Lockridge was one of the attorneys who successfully represented West Publishing Company in a monopolization and attempted monopolization case brought by West against Mead Corporation (the then owner of "LEXIS"), and in a monopolization and attempted monopolization case brought by Mead against West (the "LEXIS v. Westlaw" antitrust cases).

### **Karen Hanson Riebel**

Karen Hanson Riebel is a partner in Lockridge Grindal Nauen P.L.L.P. A 1991 dual-degree program graduate (J.D., B.A., Cum Laude) from the Boston University School of Law and the Boston University College of Liberal Arts, Ms. Riebel joined the firm in 1992.

During her tenure at the firm, she has been extensively involved in a number of complex class action matters including:

- Funeral Consumers Alliance, Inc., et al. v. Service Corporation International, et al., No. H-05-3394 (S.D. Tex.);
- In re Air Cargo Shipping Services Antitrust Litigation, 1:06-md-1775-CBA-VVP (E.D.N.Y.);
- In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation, MDL 1720 (E.D.N.Y.);

- In re Delphi Corporation Securities, ERISA, and Shareholder Derivative Litigation, Master Case No. 05-md-1725 (E.D. Mich.);
- In re Fremont General Corporation ERISA Litigation, Case No. 02:07-cv-02693 (C.D. Cal.);
- In re Tyco International Ltd., ERISA Litigation, Civil File No. 02-cv-1357 (D. N.H.);
- Boland et al v. Merrill Lynch & Co., Inc. ERISA Litigation, Civil File No. 07-cv-11054 (S.D.N.Y.);
- In re St. Jude Medical, Inc. Securities Litigation, 06-CV-01379 (D. Minn.);
- In re Credit Suisse – AOL Securities Litigation, Case No. 1:02-CV-12146-NG (D. Mass.);
- In re Worldcom, Inc. Securities Litigation No. 02-CV-3288 (S.D.N.Y.);
- In re AOL Time Warner Securities Litigation, MDL No. 1500 (S.D.N.Y.);
- In re King Pharmaceuticals, Inc. Securities Litigation, No. 2:03-CV-77 (E.D. Tenn.);
- In re Delphi Corporation Securities, ERISA, and Shareholder Derivative Litigation, Master Case No. 05-md-1725 (E.D. Mich.);
- In re Merck & Co., Inc., Securities, Derivative & ERISA Litigation, 3:05cv-1151 (D.N.J.);
- In re Federal National Mortgage Association Securities, Derivative and ERISA Litigation, MDL No. 1668 (D. D.C.);
- In re Scientific-Atlanta, Inc. Securities Litigation, No. 1:01-CV-1950 (N.D. Ga.);
- In re OM Group, Inc. Securities Litigation, No. 1:02 CV 2163 (N.D. Ohio);
- Ohio Public Employees Retirement System, et al. v. Freddie Mac, et al., MDL No. 1584 (S.D.N.Y.) (Federal Home Loan Mortgage Corporation Securities Litigation);
- In re Select Comfort Corporation Securities Litigation, Master File No. 99-884 (D. Minn.);
- In Re Lutheran Brotherhood Variable Insurance Products Co. Sales Practices Litigation, MDL No. 1309 (D. Minn.);
- Rodney v. OCA, Inc., et al., No. 05-2219 (E.D. La.);
- Danis v. USN Communications, Inc., et al., No. 98 C 7482 (N.D. Ill.);
- In re Digi International Inc. Securities Litigation, Master File No. 97-5 (D. Minn.);

- In re Summit Medical Systems, Inc. Securities Litigation, Master File No. 97-558 (D. Minn.);
- In re LaserMaster Technologies, Inc. Securities Litigation, Master File No. 4-95-631 (D. Minn.);
- In re Ancor Communications, Inc. Securities Litigation, Master File No. 97-1696 (D. Minn.);
- In re Ceridian Corp. Securities Litigation, Master File No. 97-2044 (D. Minn.);
- In re K-Tel Securities Litigation, Master File No. 98-2520 (D. Minn.);
- In re Riscorp, Inc. Securities Litigation, Master File No. CV-96-2374-CIV-T-23A (M.D. Fla.);
- In re Lease Oil Antitrust Litigation, MDL No. 1166 (S.D. Tex.);
- In re Wirebound Box Antitrust Litigation, MDL No. 793 (D. Minn.);
- David L. Antonson, et al. v. Leon H. Robertson, et al. (American Carriers Securities Litigation), Civ. No. 88-2567 (D. Kan.);
- In re Tonka II Securities Litigation, Civ. No. 3-90-318 (D. Minn.);
- In re Catfish Antitrust Litigation, MDL No. 928 (D. Miss.);
- In re ICN/Viratek Securities Litigation, 87 Civ. 4296 (S.D.N.Y.);
- Joseph D. Chutich v. Green Tree Acceptance, Inc., Master File No. 3-88-869 (D. Minn.); and
- Richard J. Rodney, Jr., et al. v. KPMG Peat Marwick, Master File No. 4-95-800 (D. Minn.).
- In re Tyco International, Ltd., ERISA Civil File No. 02-cv-1357 (D. NH)

During the summer of 1996, Ms. Riebel spent three months in New York as a member of the team of lawyers that tried the In re ICN/Viratek Securities Litigation in the Southern District of New York before the Honorable Kimba Wood. The case was settled for \$14.5 million after the jury returned a partial verdict.

Ms. Riebel spent seven months in Anchorage, Alaska, in 1994, as a member of the trial team that secured a jury verdict for punitive damages in the amount of \$5 billion for a mandatory punitive damages class in In re The Exxon Valdez, Case No. A89-0095-CV (D. Alaska). For their efforts, Ms. Riebel and the other members of the trial team were awarded the Trial

Lawyers' For Public Justice Trial Lawyers of the Year award in 1994. In addition, Ms. Riebel is extensively involved in the administration and evaluation of the more than 50,000 claims submitted in that litigation.

Ms. Riebel is admitted to practice before the United States Courts of Appeals for the Eighth Circuit, and the federal and state courts of Minnesota.

### **Nathan D. Prosser**

Nathan D. Prosser is a 2003 graduate (J.D., with honors) of the University of North Dakota School of Law, where he served as an associate editor for the University of North Dakota Law Review. He received his bachelors degree from Concordia College, Moorhead, MN in 1997. He was admitted to the Minnesota State Bar in 2003, and the U.S. District Court, District of Minnesota in 2005. He is a member of the Federal Bar Association, Minnesota State Bar Association, and Hennepin County Bar Association.

Since joining the firm in October of 2004, Mr. Prosser has specialized in class action and other complex commercial litigation. During the past four years of practice, he has been continuously active in class and complex litigation, including representation of plaintiff classes. He has worked on, among others, the following complex class action matters:

- Minnesota State Board of Investment, et al. v. Time Warner, et al., 02-CV-05575 (S.D.N.Y.);
- In re Retek, Inc. Securities Litigation, Master File No. 02-4209 (D. Minn.);
- Funeral Consumers Alliance, Inc., et al. v. Service Corporation International, et al., No. H-05-3394 (S.D. Tex.);
- In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation, MDL 1720 (E.D.N.Y.);
- In re Tyco International Ltd., ERISA, Civil File No. 02-cv-1357 (D. N.H.);
- In re Merck & Co., Inc., Securities, Derivative & ERISA Litigation, 3:05cv-1151 (D.N.J.);

- In re Scientific-Atlanta, Inc. Securities Litigation, No. 1:01-CV-1950 (N.D. Ga.);
- Ohio Public Employees Retirement System, et al. v. Freddie Mac, et al., MDL No. 1584 (S.D.N.Y.) (Federal Home Loan Mortgage Corporation Securities Litigation);
- In re St. Jude Medical, Inc. Securities Litigation, 06-CV-01379 (D. Minn.);
- In re Boston Scientific Corp. Securities Litigation; 05-CV-11934 (D. Mass).

### **Lisa M. Pollard**

Lisa M. Pollard is an associate with Lockridge Grindal Nauen P.L.L.P. She graduated from the Fordham University School of Law where she was Managing Editor of the Fordham Intellectual Property, Media and Entertainment Law Journal. She is a 1994 graduate of Cornell University where she received a Bachelor of Science Degree in Consumer Economics.

Prior to joining Lockridge Grindal Nauen P.L.L.P., Ms. Pollard worked during law school in the New York State Attorney General's office assisting in the prosecuting of white collar crime, including environmental, insurance and securities fraud. She has five years of extensive intellectual property litigation and trial experience in private practice.

Ms. Pollard is admitted to practice before the federal and state courts of New York. Ms. Pollard practices in the firm's complex and class action litigation group and has been involved in number of cases, including:

- In re Air Cargo Shipping Services Antitrust Litigation, 1:06-md-1775-CBA-VVP (E.D.N.Y.);
- In re Initial Public Offering Securities Litigation, 21 MC 92 (SAS) (S.D.N.Y.); and
- Welmon v. Chicago Bridge & Iron Co., N.V., et al., 1:06-cv-1283 (S.D.N.Y.).

## **EXHIBIT D**



### **FIRM BIOGRAPHY**

Mager & Goldstein LLP is a highly experienced class action litigation firm with offices in Pennsylvania, Florida and Arizona. In 1992, Carol Mager, together with two other experienced female trial attorneys, formed a firm concentrating on complex commercial class action litigation, partnering with Jayne Goldstein in 2000. Today, Mager & Goldstein LLP is a majority female owned firm led by its partners, Carol A. Mager, Jayne A. Goldstein and Lee Albert. The firm concentrates its practice in the areas of complex commercial litigation with a particular emphasis on securities, antitrust, consumer protection, employment, and ERISA class actions, as well as labor and employment advice. Mager & Goldstein LLP is committed, first and foremost, to the representation of its clients with the highest levels of excellence and integrity. The firm's attorneys have participated in the recovery of billions of dollars on behalf of individuals and institutions throughout the country.

The Florida Bar guidelines require that you be informed that "the hiring of a lawyer is an important decision that should not be based solely on advertisements. Before you decide, you should require additional information about our qualifications and experience."

**MAGER & GOLDSTEIN LLP**  
**AREAS OF PRACTICE**

**SECURITIES:**

The firm has been actively involved in the litigation of securities cases involving causes of action for securities fraud, breach of fiduciary duty, and shareholder derivative claims. Currently, the firm is co-lead counsel and chair of the executive committee in: *In re Sara Lee Corporation Securities Litigation* (N.D.Ill., E.Div.). In addition, the firm or firms in which Mager & Goldstein's partners were principals have been or are currently actively litigating the following: *In re Lucent Technologies, Inc. Securities Litigation* (D.N.J.); *In re Independent Energy Holdings PLC Securities Litigation* (S.D.N.Y.); *In re Sunbeam Securities Litigation* (S.D.Fla.)(trial preparation team); *In re McKesson HBOC, Inc. Securities Litigation* (N.D.Cal.); *In re Worldcom, Inc. Securities Litigation* (S.D.N.Y.); *In re OM Group, Inc. Securities Litigation* (N.D.Oh.); *In re Broadcom Corp. Securities Litigation* (C.D.Cal. S.Div.); *In re Initial Public Offering Securities Litigation* (S.D.N.Y.); *In re Mattel Securities Litigation* (C.D.Cal.); *In re AOL Time Warner, Inc. Securities Litigation* (S.D.N.Y.); *In re Merck & Co., Inc. Securities Litigation* (D.N.J.); *In re Bristol Meyers Squibb Securities Litigation* (S.D.N.Y.); *In re Nortel Networks Corp. Securities Litigation* (S.D.N.Y.); *In re Nortel II Networks Corp. Securities Litigation* (S.D.N.Y.); *In re Sportsline.com Securities Litigation* (S.D.Fla.); *In re Mutual Fund Investment Litigation* (D.Md.); *In re Motorola Securities Litigation* (N.D. Ill. E.Div.); *In re Taser Securities Litigation* (D.Az.); *In re Adecco Securities Litigation* (S.D.Cal.); *In re Cree Securities Litigation* (M.D.N.C.); *In re Spear & Jackson Securities Litigation* (S.D.Fla.); *In re Miva, Inc. Securities Litigation* (M.D.Fla.); *In re Mastec Securities Litigation* (S.D.Fla.); *In re Stonepath Group, Inc. Securites Litigation* (E.D.Pa.); *Sloane*

*Equity Partners, LLP v. Odimo Inc., et al.* (17<sup>th</sup> Judicial Circuit Broward County, Fla.); *In re Chiron Shareholder Deal Litigation* (Super.Ct. of Cal., Alameda Cty.); *In re Dana Corporation Securities Litigation* (N.D.Oh., W.Div.); *In re Refco Securities Litigation* (S.D.N.Y.); *In re Discovery Laboratories Securities Litigation* (E.D.Pa.); *In re Par Pharmaceutical Securities Litigation* (D.N.J.).

**ANTITRUST:**

The firm or firms in which Mager & Goldstein's partners were principals have been or are currently actively litigating a number of plaintiffs' class action antitrust cases including: *In re Plavix Indirect Purchaser Antitrust Litigation* (S.D.Oh.)(Executive Committee); *In re Buspirone Antitrust Litigation* (S.D.N.Y.)(Chair Third Party Discovery), *In re K-Dur Antitrust Litigation* (D.N.J.)(Co-Chair Discovery); *Ryan-House v. GlaxoSmithKline, PLC* (E.D.Va.)(Co-Chair Third Party Discovery); *Behrend v. Comcast Corp.* (E.D. Pa.); *Kristian v. Comcast Corp.* (D.Mass.); *In re Air Cargo Shipping Services Antitrust Litigation* (E.D.N.Y.); *In re Air Passenger Services Antitrust Litigation* (E.D.Pa.); *In re Insurance Brokerage Antitrust Litigation* (D.N.J.); *In re OSB Antitrust Litigation* (E.D.Pa.); *In re LTL Shipping Services Antitrust Litigation* (N.D.Ga.); *In re Chocolate Confectionary Antitrust Litigation*; (M.D.Pa.); *In re Pulse Oximetry Antitrust Litigation* (C.D.Cal.); *In re Remeron Antitrust Litigation* (D.N.J.); *In re Relafen Antitrust Litigation* (D.Mass.); *In re Pharmaceutical Industry Average Wholesale Price Litigation* (D.Mass.); *In re Neurontin Antitrust Litigation* (D.N.J.); *In re Wellbutrin SR Antitrust Litigation* (E.D.Pa.); *In re Tamoxifen Citrate Antitrust Litigation* (E.D.N.Y.); *In re Compact Disc Antitrust Litigation* (C.D.Calif.); *In re Currency Conversion Fee Antitrust Litigation* (S.D.N.Y.)(Third Party Discovery); *In re Canadian Car Antitrust Litigation* (D.Me); *In re Payment Card Interchange Fee and Merchant Discount*

*Antitrust Litigation* (E.D.N.Y.); *In re ATM Fee Antitrust Litigation* (N.D. Cal.); *In re Monosodium Glutamate Antitrust Litigation* (D.Minn.); *In re DRAM Antitrust Litigation* (N.D.Cal.); *In re Vitamins Antitrust Litigation* (D.D.C.); *In re High Pressure Laminate Antitrust Litigation* (S.D.N.Y.); *Sample v. Monsanto Company* (E.D.Mo.); *Thomas & Thomas Rodmakers, Inc. v. Newport Adhesives & Composites* (C.D.Cal.); *In re Polyester Staple Antitrust Litigation* (W.D.N.C.); *In re Automotive Refinishing Paint Antitrust Litigation* (E.D.Pa.); *Bellevue Drug Co. v. Advance PCS* (E.D.Pa.); *In re Sulfuric Acid Antitrust Litigation* (N.D. Ill.); *In re Freddie Mac and Fannie Mae Antitrust Litigation* (D.D.C.); *In re Intel Corporation Microprocessor Antitrust Litigation* (D.Del.); *In re Elevator Antitrust Litigation* (E.D.N.Y.); *McDonough, et al. v. Toys "R" Us, Inc., et al.*, (E.D.Pa.); *In re Metoprolol Succinate End-Payor Antitrust Litigation* (U.S.Del.); *In re Vitamin C Antitrust Litigation* (E.D.N.Y.); *In re Aspartame Antitrust Litigation* (E.D.Pa.).

#### **UNFAIR TRADE PRACTICE/CONSUMER PROTECTION:**

The firm or firms in which Mager and Goldstein's partners were principals have been or are currently actively involved in the prosecution of numerous consumer protection cases nationwide, in both state and federal courts. The firm's attorneys have served in leadership roles in many of these cases, including: *O'Connell v. Microsoft Corporation* (Mass. Super. Ct., Middlesex County)(Co-Lead Counsel); *Geracitano v. Microsoft Corp.* (N.J. Super. Ct., Bur. County); *Robert Hoffman d/b/a Hoffman's Tennis v. Nova Information Systems, Inc.*; (Fulton Cty, GA)(Co-Lead Counsel); *Miriam Schwom v. M&M Recovery, Inc.* (E.D.Pa.)(Co-Lead Counsel); *In re Universal Service Fund Telephone Billing Practices Litigation* (D. Kan.); *Mezori v. Rick Case Cars, Inc. d/b/a Rick Case Honda and Stephen Crane v. Rick Case Cars Inc., d/b/a Rick Case Hyundai* (17<sup>th</sup> Judicial Circuit Broward County Fla)(Lead Counsel); *Grimson v. Sprint* (15<sup>th</sup>

Judicial Circuit Palm Beach County Fla.)(Co-Lead Counsel); *In re Wireless Telephone Federal Cost Recovery Fees Litigation* (W.D. Mo.); *Graber v. AT&T Wireless* (15<sup>th</sup> Judicial Circuit Palm Beach County Fla); *Pickering v. Cingular Wireless LLC* (15<sup>th</sup> Judicial Circuit Palm Beach County Fla.); *Hellman v. T-Mobile* (15<sup>th</sup> Judicial Circuit Palm Beach County Fla); *Carver Ranches Washington Park v. Nextel Communications, Inc.* (15<sup>th</sup> Judicial Circuit Palm Beach County Fla); *Brown v. Verizon Wireless Services, LLC* (American Arbitration Association)(Class Counsel); *Molfetas v. Sprint Spectrum L.P., et al.* (15<sup>th</sup> Judicial Circuit Palm Beach County Fla); *Stainsafe, Inc.*, Class Arbitration (American Arbitration Association)(Class Counsel); *Wiener v. The Dannon Company* (C.D. CA); *Ragsdale v. SansSai USA, Inc.*(S.D.Cal.)(Lead Counsel) .

**EMPLOYMENT DISCRIMINATION AND ERISA:**

The firm or firms in which Mager and Goldstein's partners were principals have been or are currently actively involved in the prosecution of numerous employment discrimination class actions in both state and federal courts. The firm's attorneys have served in leadership roles in each of these cases: *Crespo, et al. v. Citizens Financial Group, Inc.*, C.A. No. 06-00344 (E.D.Pa.) (ADEA representative action representing plaintiffs); *Donaldson, et al. v. Exelon Corporation, et al.*, CA No. 05-1542 (E.D.Pa.) (race discrimination putative class action, representing plaintiffs); *Koebert, et al. v. PECO Energy Co., et al.*, Philadelphia Court of Common Pleas, June Term 2004 No. 0266 (Pa Wage Payment and Collection Law and Compensation class action, represented plaintiffs) *Huber, et al. v. Taylor, et al.*, CA No. 02-0304 (W.D.Pa.) (legal malpractice and breach of fiduciary duty putative class action represented plaintiffs); *Kaminski, et al. v. First Union Corp.*, CA Nos. 98-1623 (E.D.Pa.) (representative age discrimination action, represented almost 200 opt-in plaintiffs); *Osgood v. Harrah's Entertainment, Inc.*,

*et al.*, CA No. 00-CV-284 (employment discrimination class action, represented plaintiffs); *Rudolph v. Tropicana Casino & Resort*, CA No. 00-CV-190 (employment discrimination class action litigation, represented plaintiffs); *Feret, et al. v. First Union Corporation*, CA No. 97-6759 (E.D.Pa.) (ERISA class action, represented plaintiffs); *Bunnion v. Conrail, et. al.*, 1998 WL 372644 (E.D.Pa.) (ERISA and ADEA class action, represented plaintiffs). Additional experience includes *Williams v. HBE Corp.*, CA No. 98-2241 (E.D.Pa.) (employment discrimination class action, represented defendant); *Johnson v. Pullman-Standard*, 3-91-0471 (D.Minn.) (ERISA class action, represented defendant), *Dept. of Public Welfare v. The Budd - UAW Consolidated Plan*, No. 92-1272 (E.D.Pa. 1991) (represented defendant); *Murphy v. The Employee Pension Plan of the Fidelity Mutual Life Insurance Co.*, No. 92-6483 (E.D.Pa. 1993) (ERISA class action, represented one certified named plaintiff); and *Nedd (Abromovage) v. United Mine Workers*, 726 F.2d 972 (3d Cir. 1984) (pre-ERISA pension plan class action, represented defendant).

## THE FIRM'S ATTORNEYS

**CAROL A. MAGER** is a class action, employment discrimination and ERISA litigator. Her practice includes employment discrimination, civil rights, ERISA and complex commercial class actions, including antitrust and securities litigation. She also has an active practice as an arbitrator and mediator of employment and commercial disputes and as an advisor on matters of employment and education law. After serving as a partner, and practice group co-chair of two large Philadelphia defense firms, in 1992 Ms. Mager co-founded an all female litigation and labor law boutique firm. Today, Mager & Goldstein remains a majority female owned law firm.

Ms. Mager is a 1973 graduate of the University of Pennsylvania Law School and holds a B.A. with distinction, and honors in American Studies, from the University of Michigan. She was a partner and co-chair of the Labor and Employment Group of the Litigation Department at Ballard Spahr Andrews & Ingersoll in Philadelphia from 1988 to 1992. She practiced at Montgomery, McCracken, Walker & Rhoads in Philadelphia as a partner in the Labor and Employment Department from 1980 to 1988, eventually serving as vice-chair, and before that, as an associate from 1973 to 1980. Ms. Mager is an elected Fellow of the College of Labor and Employment Lawyers (1997 -). In polls of Pennsylvania lawyers and judges conducted by Law and Politics and *Philadelphia Magazine*, Ms. Mager was chosen as a Pennsylvania Super Lawyer for 2004-06 as well as a TOP 50 Female Pennsylvania Lawyer. She was also named by American Lawyer Media/*The Legal Intelligencer* as one of 56 Leading Female Pennsylvania Lawyers and specifically recognized as a leading employment litigator and included in The Best Lawyers in America, 2005-07. She is a Master of the Bench of the University of Pennsylvania Law School American Inn of Court. She has served the American Bar Association Litigation Section as its Director of Divisions, Co-Chair of the Labor and Employment Committee, Chair of the Long Range Planning Committee, and Co-Chair of its Task Forces concerning the State of the Justice System, the Judiciary, Strategy Implementation, Long Range Planning, Ethics in Settlement Negotiations, and Effectiveness of Arbitration. She is a former chair of the Philadelphia Bar Association Labor and Employment Committee. By appointment of the Board of Judges of the Philadelphia Court of Common Pleas, Ms. Mager has served as a Judge Pro Tem of that Court. She also served on the Court appointed mediation panel of the United States District Court for the Eastern District of Pennsylvania. Ms. Mager is an active member of the American Arbitration Association employment and commercial litigation panels and serves as a privately appointed arbitrator and mediator. She served as Special Discovery Master in *Velez, et al. v. QVC, Inc.*, U.S.D.C., E.D.Pa. Since September 2004, she has been a Visiting Professor at Haverford College teaching "The First Amendment and Workplace Harassment." She is admitted to the United States Supreme Court (1982); U.S. Court of Appeals Third Circuit (1977); U.S. District Court, Eastern and Middle Districts of Pennsylvania (1973-1974).

Representative cases:

- Prosecution and defense of employment, ERISA and fiduciary duty class and representative actions, all as sole or co-lead counsel, including: *Donaldson, et al. v. Exelon Corporation, et al.*, CA No. 05-1542 (E.D.Pa.) (race discrimination on behalf of white male employees, represented plaintiffs); *Crespo, et al. v. Citizens Financial Group, Inc., et al.*, CA No. 06-344 (E.D.Pa.) (representative age discrimination action); *Aaron, et al. v. Century Indemnity Company, et al.*, American Arbitration Association (severance pay claims of 82 former employees); *Koebert, et al. v. PECO Energy Company, et al.*, June Term, 2004, No. 266, Court of Common Pleas, Phila. County, PA (bonus compensation and Pa. Wage Payment & Collection Law action, represented plaintiffs); *Huber, et al. v. Taylor, et al.*, CA No. 02-0304 (W.D.Pa.) (legal malpractice and breach of fiduciary duty class action represented plaintiffs); *Kaminski, et al. v. First Union Corp.*, CA Nos. 98-1623 (E.D.Pa.) (representative age discrimination action, represented almost 200 opt-in plaintiffs); *Osgood, et al. v. Harrah's Entertainment, Inc., et al.*, CA No. 00-284 (D.NJ) (race discrimination on behalf of white employees, represented plaintiffs); *Rudolph v. Adamar of New Jersey, Inc.*, CA No. 00-190 (D.NJ) (race discrimination on behalf of white employees, represented plaintiffs); *Feret, et al. v. First Union Corporation*, CA No. 97-6759 (E.D.Pa.) (ERISA action, represented plaintiffs); *Royal v. Aramark and Moilan*, CA No. 97-6226 (E.D.Pa.) (race discrimination action, represented an individual defendant); *Williams v. HBE Corp.*, CA No. 98-2241 (E.D.Pa.) (race discrimination action, represented defendant); *Bunnion v. Conrail, et al.*, 1998 WL 372644 (E.D.Pa. 1998) (ERISA and ADEA action, represented plaintiffs); *Johnson v. Pullman-Standard*, 3-91-0471 (D.Minn.) (ERISA action, represented defendant); *Dept. of Public Welfare v. The Budd - UAW Consolidated Plan*, No. 92-1272 (E.D.Pa. 1991, represented defendant); *Murphy v. The Employee Pension Plan of the Fidelity Mutual Life Insurance Co.*, No. 92-6483 (E.D.Pa. 1993) (ERISA action, represented plaintiffs); and *Nedd (Abromovage) v. United Mine Workers*, 726 F.2d 972 (3d Cir. 1984) (pre-ERISA pension action, represented defendant);
- Participation in prosecution of current antitrust class actions: plaintiffs' counsel teams: *In re Insurance Brokerage Antitrust Litigation* (D.N.J.); *Behrend v. Comcast Corp.* (E.D.Pa.); *In re ATM Fee Antitrust Litigation* (N.D.Cal.); *In re Pulse Oximetry Antitrust Litigation* (C.D.Cal.);
- Individual employment: representation of plaintiffs in individual actions brought under the various statutes prohibiting sex, race, age and disability employment discrimination against major corporations in the financial, pharmaceutical and healthcare sectors as well as representation of defendant corporations in the same business sectors, the not-for-profit sector and educational and critical care institutions; and

- Business tort: non-competition and business tort litigation, including injunction actions in the health care, financial and software development sectors.

Alternative Dispute Resolution Training: Trained mediator for the U.S. District Court, Eastern District of Pennsylvania. Member of the American Arbitration Association Commercial Panel since 1993, and Employment Panel. Member of the American Arbitration Association U.S. Track and Field Associates Doping Panel; AAA Commercial Arbitrator II Training.

Community Activities: Educational Policy Committee of Board of Trustees, University of the Arts (1986- ); Student Affairs Committee of the Board of Trustees, Neumann College (2005- ); Former Board Member: Committee of Seventy; Philadelphia Girl Scouts of Greater Philadelphia; Girl's Coalition; Philadelphia YWCA of Philadelphia; Women's Bail Fund; The Pomfret School, Connecticut; Belmont/Einstein Medical Center, Philadelphia.

Publications: Survey on Arbitration Satisfaction, 2003, ABA Litigation Section, co-author; Ethics Guidelines for Settlement Negotiations, 2002, ABA Litigation Section, co-author; Trial Evidence in The Federal Courts, ALI-ABA, 2001, lecturer; Model Jury Instructions Employment Litigation, ABA contributing editor.

**JAYNE ARNOLD GOLDSTEIN**, a founding partner of the firm, represents clients in all types of commercial litigation including: complex litigation, violations of federal and state antitrust and securities laws, unfair and deceptive trade practices, employment law, and trusts and estates. Ms. Goldstein had a principal role in litigating *In re Sunbeam Securities Litigation* case before Judge Middlebrooks in the United States District Court for the Southern District of Florida, including pretrial proceedings and as a member of the trial team. The *Sunbeam* case settled on the eve of trial for over \$130 million. Currently, Ms. Goldstein is serving as Co-Lead Counsel and Chair of the Executive Committee in *In re Sara Lee Corporation Securities Litigation* in the Northern District of Illinois. Ms. Goldstein was named as a Pennsylvania Super Lawyer in 2007 and 2008. Ms. Goldstein, is currently or was involved in litigating the following cases:

- *In re Sara Lee Securities Litigation* (N.D.Ill.)(Co-Lead Counsel, Chair Executive Committee)
- *In re Plavix Indirect Purchaser Antitrust Litigation* (S.D.Oh.)(Executive Committee)
- *In re Chocolate Confectionary Antitrust Litigation* (M.D.Pa)
- *Ragsdale v. SansSai USA* (S.D.Cal.)(Lead Counsel)
- *In re LTL Shipping Services Antitrust Litigation* (N.D.Ga.)
- *In re ATM Fee Antitrust Litigation* (N.D.Cal.)
- *In re Insurance Brokerage Antitrust Litigation* (MDL No. 1663) (D.N.J.)
- *McDonough, et al. v. Toys "R" Us, Inc., et al.*, (E.D.Pa.)
- *In re OSB Antitrust Litigation* (E.D.Pa.)
- *In re Packaged Ice Litigation* (E.D. Mi.)

- *In re Sunbeam Securities Litigation* (S.D.Fla.)(Trial Preparation Team)
- *Wiener v. The Dannon Company, Inc.* (C.D.Ca.)
- *In re Harmon Securities Litigation* (D.C.)
- *In re Refco Securities Litigation* (S.D.N.Y.)
- *In re Microsoft Corporation Massachusetts Consumer Protection Litigation* (Mass. Super. Ct., Middlesex County)
- *Stainsafe, Inc.*, Class Arbitration (AAA)(Class Counsel)
- *Mezori v. Rick Case Honda* (17<sup>th</sup> Judicial Circuit, Broward County, Fla.) (Lead Counsel)
- *Grimson v. Sprint Corp.* (15<sup>th</sup> Judicial Circuit, Palm Beach County, Fla.)
- *Kaminski v. Wachovia* (E.D.Pa.) (Trial Preparation and Deposition Team)
- *Robert Hoffman d/b/a Hoffman's Tennis v. Nova Information Systems, Inc.* (Fulton Cty, GA)
- *In re Wireless Telephone Federal Cost Recovery Fees Litigation* (W.D.Mo.)
- *In re Motorola Securities Litigation* (N.D.Ill.)
- *Hellman v. T-Mobile* (15<sup>th</sup> Judicial Circuit, Palm Beach County, Fla.)
- *Graber v. AT&T* (15<sup>th</sup> Judicial Circuit, Palm Beach County, Fla.)
- *Carver Ranches v. Nextel* (15<sup>th</sup> Judicial Circuit, Palm Beach County, Fla.)
- *Brown v. Verizon* (American Arbitration Association)(Class Counsel)
- *Molfetas v. Sprint Spectrum L.P. and Wirelessco, L.P.* (15<sup>th</sup> Judicial Circuit, Palm Beach County, Fla.)

Prior to joining the firm, Ms. Goldstein had a wide ranging general practice in Philadelphia, Pennsylvania. During that time, Ms. Goldstein tried numerous private civil cases, including complex medical malpractice actions. Ms. Goldstein's litigation expertise has served her and the firm's clients well in her current complex commercial litigation practice.

Ms. Goldstein, a registered nurse, received her Juris Doctorate from Temple University in 1986 and received her Bachelor of Science (highest honors) from Philadelphia College of Textiles and Science. Ms. Goldstein is admitted to practice in Pennsylvania, Florida and the United States District Courts for the Eastern District of Pennsylvania, Middle and Southern Districts of Florida and the United States Courts of Appeals for the Third and Eleventh Circuits. Ms. Goldstein is also a member of the Florida Trial Attorneys, Broward Women's Lawyers Association, the Supreme Court Historical Society, the Florida Public Pension Trustees Association, and serves on the Consumer Committee of the National Association of Shareholder and Consumer Attorneys.

**MARJORIE P. ALBEE**, an associate at the firm, represents clients in a wide variety of employment matters as well as complex commercial litigation, including: Employment Discrimination, ERISA, Business Torts, Consumer Fraud, Antitrust and Securities Fraud. Ms. Albee has litigated employment discrimination and ERISA cases on behalf of both individual and class plaintiffs as well as corporate defendants, including a prominent university, a major financial institution and various other commercial enterprises. Ms. Albee has also counseled businesses, non-profit organizations and

individuals regarding a wide range of employment law matters. Moreover, Ms. Albee is currently or was involved in the following class action litigation:

- *In re OSB Antitrust Litigation* (E.D.Pa.)
- *Donaldson et al. v. Exelon* (E.D.Pa)
- *Crespo, et al. v. Citizens Financial Group, Inc., et al.*, (E.D.Pa.)
- ACE severance pay arbitrations (Phila.)
- *In re Insurance Brokerage Antitrust Litigation* (MDL No. 1663) (D.N.J.)
- *In re Sara Lee Securities Litigation* (N.D.Ill.)
- *Kaminski et al. v. Wachovia* (E.D.Pa)
- *Huber et al. v. Taylor* (M.D.Pa.)
- *In re Microsoft Corporation Massachusetts Consumer Protection Litigation* (Mass. Super Ct., Middlesex Cty.)
- *In re Sunbeam Securities Litigation* (S.D. Fla.)
- *Oliveira v. Amoco Oil* (Ill. Cir. Ct., 6th Judicial District)
- *Dersovitz v. BMW of North America* (Super Ct. of N.J., Bergen Cty)

Prior to joining the firm, Ms. Albee gained extensive litigation experience as an associate at a large Philadelphia law firm and later as Director and Associate General Counsel for a prominent corporation where she was responsible for nationwide litigation matters.

Ms. Albee received her Juris Doctorate from Temple University in 1978 and received her Bachelor of Arts (cum laude) from Connecticut College in 1974. Ms. Albee is admitted to practice in Pennsylvania and the United States District Court for the Eastern District of Pennsylvania. Ms. Albee is a member of the Pennsylvania Bar Association.

**BRUCE D. PARKE**, an associate at the firm, represents clients in complex commercial litigation, including: securities, antitrust and consumer protection. Mr. Parke is currently or was involved in the following cases:

- *In re Insurance Brokerage Antitrust Litigation* (MDL No. 1663) (D.N.J.)
- *McDonough, et al. v. Toys "R" Us, Inc., et al.*, (E.D. Pa.)
- *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation* (E.D.N.Y.)
- *In re ATM Fee Antitrust Litigation* (N.D.Cal.)
- *In re Sara Lee Corporation Securities Litigation* (N.D.Ill.)
- *In re Pulse Oximetry Antitrust Litigation* (C.D.Cal.)
- *In re Automotive Refinish Paint Antitrust Litigation* (E.D.Pa) (deposition prep. team)
- *In re Motorola Securities Litigation* (N.D.Ill.)
- *In re McKesson HBOC, Inc. Securities Litigation* (N.D.Cal.)
- *In re AOL Time Warner, Inc. Securities & "ERISA" Litigation* (S.D.N.Y.)
- *In re Broadcom Corporation Securities Litigation* (C.D.Cal.)
- *In re Remeron Antitrust Litigation* (D.N.J.)

Mr. Parke received his Juris Doctorate from the Dickinson School of Law of the Pennsylvania State University in 2002. In 1999, he received a Bachelor of Science (Administration of Justice) from Pennsylvania State University. Mr. Parke is admitted in Pennsylvania and the United States District Court for the Eastern District of Pennsylvania and is a member of the Pennsylvania Bar Association.

**JAY M. DONOHUE**, an associate at the firm, represents clients in complex commercial litigation, including: ERISA and employment discrimination law, consumer protection, antitrust, and securities. Mr. Donohue is currently or was involved in the following cases:

- *In re Canadian Car Antitrust Litigation* (D.Me.)
- *In re Insurance Brokerage Antitrust Litigation* (MDL No. 1663) (D.N.J.)
- *Donaldson, et al. v. Exelon Corporation, et al.* (E.D.Pa.) – company-wide class race discrimination action
- ACE severance pay arbitrations (Phila.)
- *Stainsafe, Inc., Class Arbitration*
- *In re Sara Lee Corporation Securities Litigation* (N.D. Ill.)
- *In re Ortho Evra Birth Control Patch Litigation* (N.J. Super.Ct., Middlesex County)
- *In re Human Tissue Products Liability Litigation* (D.N.J.)

Mr. Donohue received his Juris Doctorate from California Western School of Law in 2005. In 1999 Mr. Donohue received a Bachelor of Arts from the University of Colorado at Boulder. Mr. Donohue is admitted in Arizona, Colorado and Minnesota, the United States District Court for the District of Arizona and is a member of the Denver and Colorado Bar Associations.

**ANDREW L. MACKERER**, an associate at the firm, represents clients in complex commercial litigation, including: securities, antitrust and consumer protection. Mr. Mackerer is currently or was involved in the following cases:

- *In re Insurance Brokerage Antitrust Litigation* (MDL No. 1663) (D.N.J.)
- *In re Pulse Oximetry Antitrust Litigation* (C.D.Cal.)
- *Donaldson, et al. v. Exelon Corporation, et al.* (E.D.Pa.) – company-wide class race discrimination action
- *In re Sara Lee Corporation Securities Litigation* (N.D. Ill.)
- *In re Chiron Shareholder Deal Litigation* (Super. Ct. of Cal., Alameda Cty.)

Mr. Mackerer received his Juris Doctorate from Temple University, Beasley School of Law in 2005. In 2002, he received a Bachelor of Science from Cornell University. Mr. Mackerer is admitted to practice in Pennsylvania and New Jersey and the United States District Court for the District of New Jersey.